

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

Aug 20 4 15 PM '99

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

Docket No. C99-1

**UNITED STATES POSTAL SERVICE
NOTICE OF FILING CORRECTED PAGE TO
ANSWER IN OPPOSITION TO MOTION OF UNITED PARCEL SERVICE
TO COMPEL UNITED STATES POSTAL SERVICE TO ANSWER
INTERROGATORIES UPS/USPS—46(A), 47-49
(August 20, 1999)**

The Postal Service hereby gives notice of the filing of a correction to its Answer in Opposition to Motion of United Parcel Service to Compel United States Postal Service to Answer Interrogatories UPS/USPS-46(a), 47-49, filed on August 13. The original version identified the burden in responding to subpart (f) of interrogatory UPS/USPS-47 as "21 hours." Consistent with the Postal Service's initial objection to interrogatory UPS/USPS-47(f), this should be corrected to "21 person-days." A corrected page 6 is attached. The correction appears in bold.

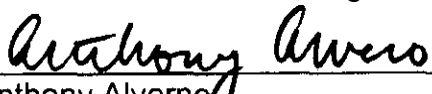
The undersigned counsel has sent a copy of this document to counsel for UPS via facsimile transmission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno

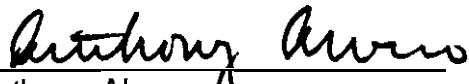
In sum, the fact that a message is directed to an e-mail address with a gTLD or a ccTLD for the many countries without registration residency requirements in no way ensures the foreign or domestic nature of the recipient, the recipient's e-mail account, the message, or the server. Indeed, even for those countries with ccTLDs that require physical presence, the recipient can be located anywhere in the world, even in the United States, while accessing the Postal Service's Post E.C.S. server.

UPS has also done nothing to overcome the Postal Service's well-documented burden objection to subpart (f). As the Postal Service explained in its initial Objection, determining the proportion of a subset of all Post E.C.S. messages sent by test participants to recipients to specified TLDs would be an enormous undertaking. In its initial Objection, the Postal Service identified with particularity the steps involved and the person-hours needed to prepare a response to this interrogatory. UPS states that the burden involved is not "significant," in view of the "importance of the jurisdictional issue at stake here." The Postal Service firmly submits that 21 **person-days** of computer programmer's time is not trivial in any circumstance, but it is manifestly unreasonable to demand it here particularly given that the results would yield absolutely no information that would shed light on Post E.C.S.'s "international" character, however UPS may believe that concept to be defined.

Interrogatory UPS/USPS-48. This interrogatory asks for information about the sharing of **software**, equipment, or other resources between Post E.C.S. and Mailing Online and **PostOffice** Online. The Postal Service objected to this interrogatory on

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-I 137
(202) 268-2997; Fax -6187
August 20, 1999